

**Baltimore City Circuit Court**

**Motion for Reconsideration**

**Mr. & Mrs. Anthony Hill,**

**Plaintiffs,**

**-v-**

**State Farm Fire and Casualty Company,**

**Defendant,**

**Mr. & Mrs. Anthony Hill respectfully shows and alleges as follows:**

- 1. The Plaintiffs herein, Mr. & Mrs. Hill, are residents of the State of Maryland. Mr. & Mrs. Hill resides at 4935 Todd Ave. apt. H, Baltimore, Maryland 21224.**
- 2. The Defendant herein, State Farm Fire and Casualty Company, has a business at 1500 State Farm Boulevard, Charlottesville, Virginia 22909. Defendant is engaged in the business of homeowners Insurance.**

**COMPLAINT**

- 1. When a loss insured causes the residence premises to become uninhabitable, we will cover the necessary increase in cost you incur to maintain your standard of living for up to 24 months.**
- 2. Defendant only compensated the plaintiffs for 6 months after the house fire in July 23, 2010.**
- 3. Defendant conducted their own investigation and came up with one of the insurer intentionally set the fire which is a fabricated statement that the Defendant has alleged on the information from their investigation which we all can say that the fire was intentionally set but not by one of the insurer.**
- 4. The Defendant is relying on the neighbor's statement. The neighbor told Defendant, Detective Perkins while under oath, three different statements during this whole investigation concerning the house.**
- 5. Plaintiff left his home and walk to the corner between 10 to 15 minutes moments before the fire.**

6. On October 26, 2009, Plaintiffs and Defendant entered into a contract with State Farm Fire and Casualty Company. The Policy states the coverage and limits for the following: dwelling \$162,800; dwelling extension \$16,280; personal property \$122,100; and loss of use actual loss sustained.
7. By reason of the facts and circumstances stated above, Defendant has breached the contract.
8. By reason of the facts and circumstances stated above, Plaintiffs have been damaged by Defendant in the amount of \$500,000.00.
9. This has caused the Plaintiffs mental anguish, depression, stress, and emotional duress. Mr. Hill hasn't worked and is now on disability since this happen to their home.

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**WHEREFORE**, Plaintiff respectfully requests that this Court enter judgment in Mr. & Mrs. Anthony Hill favor against the Defendants, jointly and severally, in the amount of \$500,000.00, plus prejudgment interest, punitive damages and such other relief as may be necessary in the interest of justice as compensation to the Plaintiff.

**Dated: January 21, 2014**

A handwritten signature in black ink, appearing to read "Mr. & Mrs. Anthony Hill". The signature is written in a cursive, flowing style.

**Mr. & Mrs. Anthony Hill**

**VERIFICATION**

**Mr. & Mrs. Anthony Hill, being duly sworn, deposes and says:**

I am the Plaintiffs in the above-entitled action. I have read the foregoing Complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matter, I believe them to be true.

To the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of these papers or the contentions therein are not frivolous as defined in Subsection. See Maryland Rule 1-325 (a).

  
Mr. & Mrs. Anthony Hill, Plaintiffs